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Attorneys for Defendants  
 CITY AND COUNTY OF SAN FRANCISCO,  
 PAUL MIYAMOTO IN HIS OFFICIAL CAPACITY AS  
 SAN FRANCISCO SHERIFF,

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

JOSHUA SIMON, DAVID BARBER, AND  
 JOSUE BONILLA, INDIVIDUALLY AND  
 ON BEHALF OF ALL OTHERS  
 SIMILARLY SITUATED, DIANA BLOCK,  
 AN INDIVIDUAL AND COMMUNITY  
 RESOURCE INITIATIVE, AN  
 ORGANIZATION,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN  
 FRANCISCO, PAUL MIYAMOTO, IN HIS  
 OFFICIAL CAPACITY AS SAN  
 FRANCISCO SHERIFF,

Defendants.

Case No. 4:22-cv-05541-JST

**DECLARATION OF LIEUTENANT KEVIN  
 LEE IN SUPPORT OF DEFENDANTS'  
 OPPOSITION TO PLAINTIFFS' MOTION  
 FOR A PRELIMINARY INJUNCTION**

Judge: Hon. Jon S. Tigar  
 Courtroom: Courtroom 6, 2nd Floor  
 Hearing Date: January 12, 2023  
 Time: 2:00 p.m.

Trial Date: Not Set

**DECLARATION OF LIEUTENANT KEVIN LEE**

I, KEVIN LEE, declare as follows:

1. I am employed as a Lieutenant with the San Francisco Police Department in the Crime Information Services Unit ("CISU"). I submit this declaration in support of Defendants' Opposition to Plaintiffs' Motion for a Preliminary Injunction. Except where otherwise indicated, the following facts are known to me personally, and if called upon as a witness, I would testify to them competently.

2. In my role with the CISU, I serve as the SFPD's custodian of records. In connection with this lawsuit I reviewed certain SFPD Incident Reports concerning Plaintiffs Joshua Simon, David Barber, and Josue Bonilla.

3. The following documents are true and accurate copies of documents from SFPD's files, apart from redactions added to private information (e.g. dates of birth, driver's license numbers, Plaintiffs' SF Numbers):

a. **Exhibit A** to my declaration is a true and correct copy of SFPD Incident Report No. 220062165, with redactions;

b. **Exhibit B** to my declaration is a true and correct copy of SFPD Incident Report No. 220335075, with redactions;

c. **Exhibit C** to my declaration is a true and correct copy of SFPD Incident Report No. 210501979, with redactions;

d. **Exhibit D** to my declaration is a true and correct copy of SFPD Incident Report No. 200536049, with redactions;

e. **Exhibit E** to my declaration is a true and correct copy of SFPD Incident Report No. 220263783, with redactions;

f. **Exhibit F** to my declaration is a true and correct copy of Emergency Protective Order dated April 22, 2022, in Case No. 220263783, with redactions; and

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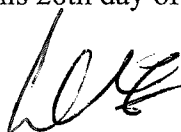
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2 g. **Exhibit G** to my declaration is a true and correct copy of SFPD Incident Report  
3 No. 220378172, with redactions.

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5 I declare under penalty of perjury under the laws of the United States that the foregoing is true  
6 and correct and that this declaration was executed on this 28th day of October 2022, at San Francisco,  
7 California.



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KEVIN LEE